

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CRIMINAL DIVISION

UNITED STATES OF AMERICA, CASE NO. 00-6040-CR-ZLOCH

Plaintiff,

VS.

DERRICK ANDERSON,

Defendants.

CLERK OF DISTRICT COURT
S.D. OF CALA-FTL

MOTION TO AUTHORIZE RELOCATION

Defendant, DERRICK ANDERSON, by and through undersigned
counsel, respectfully moves this Honorable Court to allow the Defendant to
relocate to Nassau County, New York, during the pendency of the
sentencing proceedings, and in support thereof would show:

1. The Defendant has been charged with conspiracy to distribute cocaine. The Defendant was eighteen (18) years old at the time the crime occurred. The Defendant was in South Florida, where he was attending school and living with his uncle. The Defendant's permanent address was in Nassau County, New York, where he has lived since the day he was born.

2. The Defendant desires to return home to live with his mother

and father at 1288 Waterview Drive, Rockville Center, New York. He intends remain there until the time of sentencing, which is presently scheduled for July 21, 2000.

3. The Defendant has provided assistance to the Government, in accordance with the plea agreement. The Defendant has been interviewed by Probation in connection with the sentencing report that is in the process of being completed.

4. The Defendant has a job waiting for him in New York and has all family roots and ties that he would like to return to.

5. Contact has been made with Assistant United States Attorney Terrence Thompson, who has no objection to the Defendant relocating to New York during the pendency of these proceedings, so long as the bond conditions remain in effect.

6. The Defendant's bond conditions include a personal surety signed by family members, including his mother, father and uncle. Those remain in effect. The Defendant is required to appear at pre-trial once per week. He is to provide a urine sample and complete a report of his activities. The Defendant will continue to report to the Pre-Trial Office in Nassau County, subject to the file being transferred with this Court's permission.

7. The Defendant is in compliance with all of the special terms and conditions of his pre-trial release.

8. Contact has been made with the pre-trial officer, DARWIN CRENSHAW, who has confirmed that he is in compliance and no objection is interposed by Pre-Trial.

WHEREFORE, Defendant, DERRICK ANDERSON, respectfully moves this Honorable Court to enter an order authorizing him to relocate from South Florida to Nassau County, New York, until the time of sentencing.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 12 day of May, 2000, to **TERRENCE THOMPSON, ASS'T. UNITED STATES ATTORNEY**, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301; and **KENNETH P. HASSETT, ESQ.**, Hassett & Associates, P.A., Attorney for Defendant Dairiel Worrell, 201 Sevilla Avenue, Suite 202, Coral Gables, Florida 33134; **DARWIN CRENSHAW**, Pre-Trial Officer, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301.

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